

# LUKAS, NACE, GUTIERREZ & SACHS, LLP

8300 GREENSBORO DRIVE, SUITE 1200  
MCLEAN, VIRGINIA 22102  
703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS  
DAVID L. NACE  
THOMAS GUTIERREZ\*  
ELIZABETH R. SACHS\*  
DAVID A. LAFURIA  
PAMELA L. GIST  
TODD SLAMOWITZ\*  
BROOKS E. HARLOW\*  
TODD B. LANTOR\*  
STEVEN M. CHERNOFF\*  
KATHERINE PATSAS NEVITT\*

CONSULTING ENGINEERS  
ALI KUZEHKANANI  
LEILA REZANAVAZ  
—  
OF COUNSEL  
GEORGE L. LYON, JR.  
LEONARD S. KOLSKY\*  
JOHN CIMKO\*  
J. K. HAGE III\*  
JOHN J. MCAVOY\*  
HON. GERALD S. MCGOWAN\*  
TAMARA DAVIS BROWN\*  
JEFFREY A. MITCHELL\*  
ROBERT S. KOPPEL\*  
MARC A. PAUL\*

\*NOT ADMITTED IN VA

Writer's Direct Dial  
(703) 584-8672

[tamara.davisbrown@fcclaw.com](mailto:tamara.davisbrown@fcclaw.com)

February 25, 2012

## VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Suite TW-A325  
Washington, D.C. 20554

**RE: Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
Covering Calendar Year 2011  
EB Docket No. 06-36  
Charles C. Stull  
FCC Filer ID 817569 / FRN 0003993383**

Dear Ms. Dortch:

Charles C. Stull by its attorneys and pursuant to Section 64.2009(e) of the Commission's rules, hereby submits the attached letter in response to DA 12-170 regarding the FCC's annual CPNI Certification.

If there are any questions regarding this submission, please contact Elizabeth R. Sachs at 703-584-8663 or [lsachs@fcclaw.com](mailto:lsachs@fcclaw.com), or the undersigned.

Very truly yours,



Tamara Davis Brown

Enclosures

cc: Best Copy and Printing, Inc.

**Charles C. Stull**  
**P. O. Box 168**  
**Braddock Hts., MD 21714**

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW Suite TW-A325  
Washington, D.C. 20554

Re: **47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket No. 06-36**  
**Charles C. Stull**  
**FCC Filer ID 817569 - FRN 0003993383**

Dear Ms. Dortch:

Mr. Charles C. Stull, an individual hereby files this letter in lieu of the CPNI certification statement. The FCC previously determined in a December 2010 Order that licensees with non-interconnected, dispatch-only operations were not obligated to make a CPNI filing, and cancelled the related forfeiture issued for failure to make such a filing. Mr. Stull operates a non-interconnected, dispatch-only system identical to those licenses in the December Order. Accordingly, Mr. Stull believes he is not required to make an annual CPNI filing.

Please note that Mr. Stull will not make any future CPNI-related filings unless the he modifies its offering to include interconnected service or unless he is directed to file by the FCC. Should the Commission have any questions, please contact the undersigned.



---

Name: Charles C. Stull  
Title: Individual  
Date: 2/22/2012